

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Barbara E. Peace)	Case No.14-22615 JAD
William H. Peace Jr.)	Chapter 7
Debtors)	Related to Docket Nos. 138 & 139
)	
Wilmington Savings Fund Society, FSB,)	Hearing Date and Time:
d/b/a Christiana Trust, not individually but)	12/6/2022 at 10:00am
as trustee for Pretium Mortgage Acquisition)	
Trust, its successors and/or assigns)	
Movant)	
)	
Barbara E. Peace)	
William H. Peace Jr.)	
Respondents)	
)	
and)	
)	
Rosemary C. Crawford)	
Additional Respondent)	

**RESPONSE TO MOTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB
D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR
PRETIUM MORTGAGE ACQUISITION TRUST, ITS SUCCESSORS AND/OR
ASSIGNS FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

AND NOW, come the Debtors, William H. Peace Jr. and Barbara E. Peace, by and through their attorneys, Lauren M. Lamb and Steidl and Steinberg, P.C., and respectfully represent as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Debtors are without sufficient information to confirm the payoff.

6. Admitted with clarification. Debtor-wife intends to cure the default with the exempted funds from her mother's estate as soon as the Chapter 7 Trustee can release those funds.
7. Denied. The reinstatement amount fails to credit the suspense balance.
8. Denied. Debtors are without sufficient information to confirm the fair market value of the property.
9. Admitted.
10. Admitted.
11. Admitted.
12. Denied.
13. Denied.
14. Admitted.
15. This is a statement to which no response is required. However, to the extent a response is required, the same is denied.

WHEREFORE, the Debtors, William H. Peace Jr. and Barbara E. Peace, respectfully request this Honorable Court deny the Motion for Relief from the Automatic Stay.

Respectfully submitted,

November 28, 2022
DATE

/s/ Lauren M. Lamb
Lauren M. Lamb
Attorney for the Debtors
STEIDL & STEINBERG
Suite 2830 – Gulf Tower
707 Grant Street

Pittsburgh, PA 15219
(412) 391-8000
llamb@steidl-steinberg.com
PA I.D. No. 209201